



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-3280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

August, 23, 2013

Mr. Bruce Bailey
Vice President of Technical Affairs
Quasar Energy Group, LLC
7624 Riverview Road
Cleveland, OH 44141

Subject: Dovetail Energy Group, LLC Anaerobic Digester agricultural exemption request

Mr. Bailey:

On June 7, 2013, our office received a request for an agricultural exemption for an anaerobic digester that would be installed at the Pigstick Hog Farm located at 1146 Herr Road, Fairborn Ohio, in Greene County. Following multiple emails and conversations with Quasar Energy Group LLC, the Regional Air Pollution Control Agency (RAPCA) received the requested information and calculations regarding the operation of the digester and shared it with Ohio EPA as well. Quasar Energy Group submitted the exemption request on behalf of Dovetail Energy Group LLC.

Upon reviewing the requested information, RAPCA and Ohio EPA have determined that the Dovetail anaerobic digester meets the agricultural exemption described in Ohio Revised Code (ORC) 3704.01, which excludes certain types of "agricultural production activities" as defined in Section 929.01 of the ORC. The anaerobic digester qualifies for an Ohio Legislature Exclusion for agricultural productions operation under Ohio Revised Code (ORC) 3704.01. The Ohio Legislature provides for a specific exclusion for agricultural production operations if certain criteria are met. The specified criteria are contained within the definition of air contaminant as defined in ORC 3704.01(B). Also, based on draft Ohio inter-office communication, Re: Permit Applicability Issues Associated with Anaerobic Digesters, dated June 24, 2009, the operations at the facility meet the 4 criteria for agricultural production operation for the purpose of managing their agricultural waste and thus an air permit is not needed.

If you have any further questions or comments, please contact me at (937) 225.5922 or email clinefcd@rapca.org.

Sincerely,

Christopher D. Clinefelter
Permit Group Supervisor
Regional Air Pollution Control Agency

Cc: Joe Reynolds SWDO Ohio EPA (via email)
Darla Peele PIC Ohio EPA (via email)